

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JOSEPH MANTHA, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

**DEFENDANT'S FIFTH REQUEST FOR PRODUCTION OF DOCUMENTS TO
PLAINTIFF**

Defendant QuoteWizard.com, LLC ("QuoteWizard") hereby propounds, pursuant to Fed. R. Civ. P. 34, the following Fifth Set of Requests for Production of Documents to Plaintiff Joseph Mantha ("Mantha"). Plaintiff should produce the following documents to the office of QuoteWizard's attorney, Nelson Mullins Riley & Scarborough LLP c/o Christine M. Kingston, Esq., One Post Office Square, 30th Floor, Boston, Massachusetts 02019.

Instructions and Definitions

1. Plaintiff is to produce to QuoteWizard's attorney listed above all documents set forth below that are in Plaintiff's possession, custody, or control and that meet the descriptions, directly or indirectly, set forth in each such category.
2. Each request seeks all information available to Plaintiff, to Plaintiff's agents, and to any other person acting on Plaintiff's behalf. Each request shall be deemed to be continuing in the manner provided by law.
3. If a request cannot be answered in full, answer to the fullest extent possible and specify all reasons for the inability to answer in full.

4. In the event that any document or thing called for in any of these requests has been destroyed, lost, discarded or otherwise disposed of, identify as completely as possible each such document or thing, including, without limitation, the following information: date of disposal, place and manner of disposal, reason for disposal, person authorizing the disposal, and persons disposing of the document or thing.

5. As used herein, a "document" or "documents" means any kind of written or graphic material, however produced or reproduced, of any kind or description whether sent or received or neither, including originals, copies and drafts of both sides thereof, and including, but not limited to, papers, books, accounts, letters, photographs, objects, correspondence, telegrams, cables, telex messages, memoranda, notes, notations, work papers, transcripts, affidavits, minutes or reports of telephone or other conversations, or of interviews, or of conferences, or of meetings, inter- or intra-office communications, inter- or intra-departmental communications, inter- or intra-company communications, resolutions, certificates, opinions, reports, studies, analyses, evaluations, contracts, licenses, agreements, ledgers, journals, books or records of account, summaries of accounts, balance sheets, interim statements, budgets, receipts, invoices, desk calendars, appointment books, diaries, lists, tabulations, summaries, sound recordings, computer tapes, magnetic tapes, microfilms, punchcards, and all other records kept by Plaintiff and anything similar to the foregoing.

6. If Plaintiff claims any privilege or immunity from discovery with regard to any documents sought herein, then please provide the following information as to each document to which such claim is made: (a) its date; (b) the name and address of its maker; (c) the name and address of each person listed as an addressee; (d) the name and address of each person who has seen or reviewed each such document; (e) a brief description of its subject matter; (f) the nature of privilege or immunity claimed; and (g) and a summary of all facts and circumstances upon which claim is based.

7. These requests are continuing in nature. Should Plaintiff acquire additional information or documents responsive to these requests after serving his responses hereto, the responses and document production shall be supplemented so as to provide such additional information or documents.

8. As used herein, the term “communication” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).

9. As used herein, the term “person” is defined as any natural person or business, legal, or governmental entity or association.

10. As used herein, the term “concerning” means referring to, describing, evidencing, or constituting.

11. As used herein, the term “date” means the exact date, month and year, if ascertainable, or, if not, the best approximation thereof, with a statement that such is an approximation.

12. As used herein, “You,” “Your,” “Plaintiff” or “Mantha” shall refer to Plaintiff Joseph Mantha, or any individuals or entities acting on your behalf.

13. As used herein, “QuoteWizard” shall refer to QuoteWizard.com, LLC or any individual or entity acting on its behalf.

Requests for the Production of Documents

45. Any and all documents showing credits or payments requested by you and/or given to you by Dr. Franklin Perkins School in 2019 for your use of your cell phone and/or cell phone data in connection with or related to your employment.

46. Any and all telephone directories for Dr. Franklin Perkins School from the Ring Central application or any other source, including any other electronic application(s).

QuoteWizard.com, LLC,

By its attorneys,

/s/ Christine M. Kingston

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Dated: September 10, 2020

CERTIFICATE OF SERVICE

I, the undersigned, of the law offices of Nelson Mullins Riley and Scarborough LLP, attorneys for Defendant QuoteWizard.com, LLC, do hereby certify that I have served all parties of record with copies of the below listed documents by electronic mail and U.S. Mail on this 10th day of September 2020:

Documents:

- Defendant QuoteWizard.com, LLC's Fifth Set of Requests for the Production of Documents to Plaintiff Joseph Mantha

/s/ Christine M. Kingston

Christine M. Kingston